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March 10, 2022

VIA CM/ECF

The Honorable John G. Koeltl
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

**Re: *Business Casual Holdings, LLC v. YouTube, LLC et al.*,
No. 1:21-cv-03610-JGK**

Dear Judge Koeltl:

We represent Defendants YouTube, LLC, Google LLC, and Alphabet Inc. (together, “YouTube”) in the above-captioned action. We write concerning the oral argument on YouTube’s motion to dismiss (Dkt. 28) set for March 18, 2022 at 10:00 AM. That argument is currently scheduled for the same day and time as oral argument on TV-Novosti’s (TVN) motion to dismiss in the Related Case, No. 1:21-cv-02007-JGK.

This morning, counsel for TVN filed a motion to withdraw as counsel, to give TVN sixty (60) days to arrange new counsel, and to adjourn the oral argument on TVN’s Motion to Dismiss until a date two weeks after the deadline the Court provides for TVN to obtain new counsel. YouTube, of course, takes no position on that motion.

As for oral argument on YouTube’s pending Motion to Dismiss, YouTube is willing and able to proceed on March 18 as scheduled, and notes that the issues raised in its Motion are separate and distinct from those raised in TVN’s motions. Should the Court prefer, however, YouTube has no objection to adjourning the hearing until an appropriate date when TVN’s motion can also be heard, or simply resting on its papers.

Very truly yours,

WILSON SONSINI GOODRICH & ROSATI
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Jason Mollick